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SUBJECT: NEPAL: FOURTH ANNUAL ANTI-TRAFFICKING IN PERSONS
(TIP) REPORT

REF: SECSTATE 7869

¶11. (U) Following is Post's submission for the fourth annual Trafficking in Persons (TIP) Report. Embassy point of contact for the report is Political Officer Crystal Kaplan (tel: 977-1-441-1179, fax: 977-1-441-0723, e-mail: kaplanct2@state.gov).

¶12. (SBU) OVERVIEW

-- A. Nepal is a country of origin for international trafficking of women and children. Some trafficking also occurs within the country. The majority of those trafficked are poor, undereducated young women, though trafficking in boys also has been reported. Girls as young as nine years old have been trafficked.

The magnitude of the problem remains difficult to measure, as reliable data are not available. The most widely quoted NGO statistics state that 5,000 to 7,000 girls are trafficked to India for prostitution each year, but these figures are extrapolated, based on a number of assumptions, and do not take into account any victims who are trafficked for purposes other than prostitution. The GON does not keep official statistics on the number of victims trafficked.

An ILO-IPEC Rapid Assessment Survey (2002) on Trafficking in Girls with Special Emphasis on Prostitution estimated that 12,000 girls are trafficked every year. The study targeted populations including "at-risk" girls, girls who had been trafficked within Nepal, and those who had returned from India. Though trafficking is prevalent in many castes and ethnic groups, the ILO assessment concluded that those most at risk are members of lower castes and ethnic groups traditionally resident in Nepal's hilly regions. Similarly an analysis done in 2003 by the Women's Police Cell of cases reported in the past seven years (1997 through 2003) has substantiated this finding.

Discrimination based on caste and ethnicity, though illegal in Nepal, is imbedded in economic and social structures. Gender-based discrimination is widespread, deeply rooted in tradition and sometimes supported by law. Women and girls from lower castes or "hill" ethnic groups therefore can be subject to double or triple marginalization, increasing their vulnerability to exploitative practices such as trafficking.

Additionally, the ongoing Maoist insurgency has disrupted government control in many of the country's remote areas. Absence of law enforcement, economic insecurity, political instability and physical danger as a result of the armed conflict have displaced thousands of women and children from the poorest sectors of society. Threats of abduction by the Maoists have compelled large numbers of children to leave their homes to avoid forced conscription. Death of one or both parents has lowered an already poor standard of living for many children, forcing them to work outside the home or fend for themselves on the street. NGOs report that trafficking is on the rise in these vulnerable populations, although the insurgency has caused a decrease in reporting of trafficking cases. Decreased reporting can be attributed to the withdrawal of police posts from most rural areas, increasing the difficulty of accessing and reporting cases of trafficking to law enforcement officials. According to the Nepal Police, the numbers of reported cases has decreased from 98 cases in 2000/01 to 48 cases in 2001/02 and 72 cases in 2002/2003. (Reporting periods are based on the Nepali calendar which runs roughly from April to April.)

¶1B. (U) The Ministry of Women, Children and Social Welfare (MWCSW) has identified 26 high-priority districts for anti-trafficking interventions, most of which are in Nepal's hilly, undeveloped regions. Most trafficking victims originate in these high-priority districts. Women and children who have migrated to Kathmandu and other urban areas to find work also reportedly have been trafficked. These internally-displaced women and children are more vulnerable to trafficking, but also are absorbed into

Nepal's exploitative labor market, including for commercial sex work in night clubs, dance restaurants and massage parlors.

Nepali trafficking victims are most often taken overland to India for work in that country's sex industry and for bonded labor. Some victims are also trafficked to Hong Kong, Saudi Arabia and other countries in the Middle East. The complicated nexus between migration and trafficking needs to be explored more intensively as girls and women in the process of labor migration reportedly are targeted and diverted into illegal trafficking.

-- C. No significant changes in the direction or extent of trafficking have been reported in the last year, although press reports in 2003 indicate that children may be trafficked for work in Indian circuses. Additionally, both children and adult victims of trafficking may be subjected to organ removal for transplants. Collaborative efforts among NGOs in India and Nepal have been successful in the rescue and repatriation of more Nepali girls this year.

-- D. Nepal's Institute for Integrated Development Studies (IIDS) conducted a study entitled "Status and Dimension of Trafficking Within Nepal" with UNIFEM support under the South Asian Regional Initiative for Gender Equity (SARI/Q) program that will be disseminated in 2004. Other relevant studies conducted in 2003 include: An Analysis of Laws and Policies on Labor Migration and Trafficking (Center for Legal Research and Development and The Asia Foundation); Safe Migration: Foreign Employment for Women: Opportunities and Challenges - Collection of Articles (UNIFEM); Best Practices on Rehabilitation and Reintegration of Trafficked Women and Girls (Joint Initiative on Trafficking (JIT) and Sahara Group); Effectiveness of Existing Laws and Policies, Services and Issues of Nepali Migrant Workers (GON/UNIFEM/SAMANATA); and Effectiveness of Existing laws and institutional mechanisms to Combat Trafficking in Women in Nepal (UNIFEM/Forum for Women's Legal Development (FWLD)/SARI/Q).

-- E. Not applicable. Nepal is not a destination country for trafficking in persons.

-- F. Government officials, police and NGOs suspect that organized criminal groups and "marriage brokers" are the main traffickers in Nepal. Though most are Nepali, they have links with brothels in Mumbai and other cities in India. The traffickers typically target high-vulnerability groups like those listed in para A. NGOs have found that once prevention programs are instituted in a district, traffickers move on to other locations.

In general, the main factors contributing to trafficking in women and girls from Nepal are poverty, lack of alternative employment opportunities, illiteracy, ignorance about the dangers of prostitution, family disharmony, domestic violence, gender discrimination and desire for better life. Contributing to the young age of trafficked girls is a prevailing myth that sexually transmitted diseases, including HIV/AIDS, can be cured through sexual intercourse with a virgin girl. Contributing factors to the smaller phenomenon of trafficking of boys for exploitative labor include poverty and lack of alternative employment opportunities, as well as a traditional pattern of male migration for employment. Weak legislation and lack of effective law enforcement mechanisms also contribute to Nepal's trafficking problem.

NGOs estimate that approximately half of victims are lured to India with the promise of a good job and/or marriage, but many others are sold by family members. A small number are kidnapped. No firm numbers are available. Lack of awareness regarding safe migration and options for alternative jobs often leads legitimate migrants to become vulnerable to trafficking.

Nepal and India have an open border. Traffickers typically move their victims overland on secondary roads or via public transportation. Similarly, illegal migration to third countries in the Middle East takes place through India and Bangladesh by air routes.

-- G. Anti-trafficking in persons is not a top priority of the Government of Nepal as demonstrated by the lack of resources dedicated to the issue. However, commitment is strong within government line agencies, such as the National Police and the Ministry of Women, Children and Social Welfare (MWCSW). The MWCSW has instituted a National Task Force Against Trafficking to coordinate government response, and is working with the ILO, UNDP and other international organizations to increase GON capacity to prevent trafficking and prosecute offenders. Directly and through district-level task forces, the Ministry coordinates with NGOs to rehabilitate and assist victims. There are programs in place to train police forces and the judiciary to deal

effectively with trafficking cases, but these programs reach only a limited number of officials.

The MWCSW has drafted strengthened anti-trafficking legislation to assist in the prosecution of offenders. The legislation has not yet passed due to the dissolution of parliament. However, effort is being made to pass the bill by decree.

-- H. There is no documented evidence that government authorities or individual members of government facilitate trafficking, condone trafficking or are otherwise complicit in such activities. However, some government authorities such as immigration officials, police and judges are susceptible to graft and corruption, and these practices no doubt play a role in the prosecution of traffickers. There have been no reported instances of prosecution or conviction of government officials on trafficking-related charges.

-- I. One of the poorest countries in the world, Nepal lacks the resources to address many of the underlying causes of trafficking. Under-funded government welfare agencies are generally incapable of delivering effective outreach programs or assistance to trafficking victims. As a result, anti-trafficking efforts have been primarily the domain of NGOs and bilateral donors.

Institutional capacity to address the trafficking problem is weak. In particular, the police lack both training and resources, and the courts are overburdened and susceptible to corruption. Current investigation and prosecution of corrupt officials, including those in the judiciary, by the Commission to Investigate Abuse of Authority (CIAA) might deter some officials from committing corrupt acts.

Political instability has also hampered GON anti-trafficking efforts. Several governments have come and gone in rapid succession and since the dissolution of the last parliament in May 2002, no elections have been held. As a result, draft legislation to strengthen law enforcement and prosecution of trafficking-related offenses has yet to be passed, and the "National Plan of Action" to combat trafficking has yet to be fully implemented.

-- J. According to the National Plan of Action, district task forces are mandated to identify trafficking prone areas, conduct awareness raising campaigns, collect data on trafficking of women and children, disseminate trafficking related information and coordinate with all stake holders to address the issue of trafficking. Monitoring is an integral part of their responsibility. MWCSW, with support from the Center for Development and Population Activities (CEDPA), established the Documentation and Information Center (DIC) within MWCSW and has in place the Management information System (MIS) which aims to track trafficking cases and NGO interventions at the districts. MWCSW disseminated information on program activities on a quarterly basis through the publication of Combat Newsletter. In practice, however, little information is sent from the districts to the DIC.

-- K. National law is silent regarding prostitution, although the concept of decriminalization prevails. In practice, however, prostitutes are frequently treated as criminals for violating public decency under the Public Offence Act. Under current law, the Trafficking Control Act 1986, brothel owners are punished for the act of forced prostitution but the law is silent about punishments for the client, pimp or enforcer. The proposed Human Trafficking Control Bill of 2002 includes the concept of criminalization of prostitution and is progressive in proposing "in camera" hearings for survivors and compensation to the victims.

-- L. Child marriage is still widespread in Nepal's rural areas, but becoming less common. Not only is child marriage prohibited by the law, but there appears to be growing awareness of the dangers posed by child marriage. Although there is no system of buying or selling a child to be a bride, buying girl children does occur in some remote areas of the mid west and far west of Nepal. In many of these cases, the girls are offered to temples as 'Deukis'. In the past some 'deukis' have adopted prostitution as a profession.

In the far west there is a custom of 'bride price' whereby the groom pays money to the girl's family. This customary practice may lead to trafficking as there is monetary exchange and the unsuspecting parents can become easy targets of traffickers. There are no reported cases of buying or selling child brides or of Nepali men traveling abroad to purchase child brides.

13. (SBU) PREVENTION

-- A. Prime Ministers, political party leaders, parliamentarians and ministry officials have stated publicly

that trafficking is a national problem. Former Prime Minister Sher Bahadur Deuba affirmed during his tenure that "the government has taken trafficking as a serious problem," and "a serious crime." Pledging to seek stronger laws to prosecute traffickers, Deuba also said the government must address the underlying causes.

-- B. The MWCSW has primary responsibility for the development and coordination of the GON's anti-trafficking efforts. In addition, the MWCSW has instituted a National Task Force Against Trafficking that includes personnel from the National Planning Commission, the Nepal Police and the Ministries of Labor and Transportation Management; Home Ministry; Foreign Affairs; Law, Justice and Parliamentary Affairs; Education and Sports; and Health. The ILO, UNICEF and two representative NGOs are also members.

Additionally, the Nepal Police have established local-level Women and Children Service Centers as part of their community policing efforts. The Centers operate with a combined mandate of law enforcement, counseling and public awareness.

-- C. The MWCSW, NGOs and UNIFEM continue to implement local, regional and national information campaigns about trafficking in persons. The GON prepares radio programs, audio-visual presentations, booklets, pamphlets and signboards aimed at preventing trafficking among vulnerable groups. "Village Vigilance Committees" (VVCs) have been established in some districts, training local residents to recognize possible trafficking cases and rescue potential victims before they can be moved across the border. The GON is considering an expansion of current efforts to activate district and village anti-trafficking task forces in the twenty-six "high risk" districts.

These efforts and others by the GON, INGOs and NGOs to raise public awareness have resulted in the interception of potential trafficking victims at the community and Indo-Nepal border and positive acceptance of the survivors by the community and family. The positive impact of media advocacy was shared in a regional meeting organized by USAID/UNIFEM/ATSEC in Dhaka in January 2004. Media advocacy for policy change also had an impact in 2003. As a result, key decisions were made by the Council of Ministers to register companies for the provision of mandatory overseas orientation to labor migrants and to lift the ban on women's movement to the Gulf for the purpose of labor migration.

-- D. Under a 2003 GON initiative, all workers traveling overseas are required to attend an orientation session explaining worker rights, safety issues and relevant regulations. A labor office was established at the airport to reinforce the message. The GON also abolished a five-year-old rule prohibiting Nepali women from working in Gulf countries. The ban was imposed in 1998 after reports surfaced of hardship and abuse from returning women workers. Women's activists had voiced concerns that while the law did not prevent Nepali women from clandestinely departing from India for work in the Gulf, it restricted women's access to information about their destinations and prevented them from attending orientation classes, putting them at risk of exploitation.

The MWCSW publishes a newsletter addressing issues of concern to women and children, and operates a program in 47 districts to emphasize to parents the importance of sending their children to school. Encouraging children to stay in school is also a large component of the government's campaign to eliminate child labor, currently being carried out under the auspices of a USDOL-funded Timebound and Brighter Future Projects.

Government-initiated income-generation projects have been introduced in more than 3900 villages, providing micro-credit loans, administering savings programs and encouraging banks to support women entrepreneurs in almost all districts of the country.

--E. The GON is unable to support financially most prevention programs, but is very receptive to private efforts. The government makes its personnel readily available to take part in anti-trafficking training programs, provides government facilities for outreach programs and training, and otherwise supports private initiatives to the best of its ability.

-- F. The MWCSW fosters a collaborative relationship with donors and NGOs in joint pursuit of anti-trafficking goals. For example, "Beyond Trafficking -- A Joint Initiative in the Millennium Against Trafficking of Girls and Women (JIT)" is a collaborative effort of the MWCSW, UN System Task Force Against Trafficking and other donors. In addition to cooperative work on the JIT and Information, Education and Communication campaign, the Ministry has also worked collaboratively with CEDPA and the ILO to establish a Documentation and Information Center on trafficking and

developed software to manage information. An Office of the National Rapporteur for Trafficking has been set up with input from UNDP in the National Human Rights Commission.

-- G. Nepal's open land border with India does not allow for stringent monitoring. One NGO has had some success at monitoring the border independently, and UNICEF has provided training for police and immigration officials to help them identify potential trafficking victims at border crossings. A cross-border initiative also has been established whereby Nepali border officials and NGOs develop mechanisms for the effective interception of potential victims at Indo-Nepal crossings and the rescue and repatriation of victims from India. More donors have become interested in supporting border surveillance activities and establishing transit homes along the Indo-Nepal borders.

-- H. See para B for information about GON anti-trafficking task force. The Commission for the Investigation of the Abuse of Authority investigates public corruption.

-- I. At a South Asian Association for Regional Cooperation (SAARC) Summit held in January 2002, Nepal, together with India and other South Asian countries, signed the SAARC Convention on Preventing and Combating the Trafficking in Women and Children for Prostitution. Together with other SAARC countries, Nepal has agreed to establish SAARCPOL, a regional body to fight trafficking and other transnational crimes. Nepal and India have agreed to form a Joint Cross Border Committee Against Trafficking.

Nepali civil society has lobbied for ratification of the SAARC convention in the absence of a national legislature. In January 2004, civil society organizations from South Asia participated in a parallel summit during the 12th SAARC summit in Islamabad to advocate for the ratification, amendment and effective implementation of the SAARC Convention by member states.

Nepal is a party to the Convention on Elimination of All Forms of Discrimination Against Women (CEDAW), the UN Convention on the Rights of the Child, the ILO Minimum Age Convention, the ILO Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, the ILO Forced Labor Convention and the Convention on the Abolition of Slavery.

-- J. The GON's National Plan of Action to combat trafficking was developed in consultation with ILO, NGOs and relevant government agencies. The National Plan was finalized in 2003 and is in the process of being implemented through various stakeholders.

-- K. The MWCSW's National Task Force Against Trafficking is responsible for approving anti-trafficking programs developed by the GON and monitoring anti-trafficking efforts in the country.

14. (SBU) INVESTIGATION AND PROSECUTION OF TRAFFICKERS

-- A. The absence of a national legislature continues to delay enactment of new anti-trafficking legislation. Draft legislation exists and is expected to be brought before a new session of Parliament, once elections are conducted.

The Human Trafficking Control Act of 1986 is the current anti-trafficking legislation. It prohibits:

- Selling of a human being for any purpose;
- Taking any person to a foreign territory with an intention of selling that person to a third party;
- Involving any woman in prostitution by enticement, allurement, fraud, threat, coercion or any other means;
- Abetting, assisting, conspiring or attempting to carry out any of the above acts.

The 1986 Act is flawed in several ways. It does not criminalize the separation of a minor from his or her legal guardian with the intent of trafficking the minor, nor does it criminalize the receipt of a trafficked person. Under the terms of the Act, no crime occurs until the victim and perpetrator are outside Nepali jurisdiction. (Adding to this problem is the absence of an India-Nepal extradition treaty that covers human traffickers.) The Act makes no provision for the compensation or protection of trafficking victims. Victims are often reluctant to testify, because trials are held in open court and there is no legal protection for witnesses. Local police cannot investigate trafficking complaints without permission from prosecutors, and the resultant delay gives perpetrators time to flee.

-- B. The 1986 Act provides for jail terms of up to 20 years for traffickers, but sentences are often much less. Approximately 40% of traffickers receive minimum sentences when convicted. [Updated information on prosecution statistics will be forthcoming septel.]

-- C. Penalties for rape vary with the age of the victim. If the victim is under 16, jail sentences of up to ten years are possible. For victims 16 and over, sentences can be up to five years. In either case, the court may order a convicted rapist to give half of his property to the victim. NGOs state that victims are not detained, jailed or deported. If the victim is a foreigner, he or she will be handed over to the concerned Embassy.

-- D. During 2002/2003 72 cases of trafficking were reported to the police. 2003/2004 prosecution statistics are not yet available. (Post will provide them septel prior to publication of TIP report.) The GON has prosecuted cases against traffickers though punishments generally are minimal. An analysis by the Nepal Police of cases registered between May 2002 and April 2003 revealed that most traffickers had trafficked several victims multiple times, and the number of offenders far exceeds the number of registered cases as there may be several offenders involved in one registered case.

Media coverage on traffickers arrested by the community has risen in the past year due to raised awareness within communities. Prosecution has improved with more stringent punishment of traffickers and their accomplices. One progressive legal decision that set a precedent is the case of Durga Dhimal vs. His Majesty's Government. In this case, the Supreme Court made a very strict interpretation on the issue of trafficking so that the statement of the victim is treated as substantial evidence. Another progressive amendment in prosecuting human traffickers is that the burden of proof lies on the accused defendant. However, a loophole places the burden of proof on the victim in cases of complicity of a relative. In more than 75% of cases, a relative is involved.

Nepal experienced several successful prosecutions this year. In June 2003, seven Nepalis were convicted for trafficking over 100 victims. The leader of the trafficking ring was sentenced to 75 years imprisonment with lesser sentences for the other 6 traffickers. In another case in February 2004, a district court convicted one Nepali of selling his first cousin in a Mumbai brothel and sentenced him to a minimum of 15 yrs imprisonment.

-- E. Government officials, police and NGOs suspect that organized criminal groups and "marriage brokers" are the primary perpetrators of trafficking in Nepal. They note that parents and other relatives of trafficking victims are often complicit as well.

-- F. By its own admission, the government lacks the trained manpower necessary to investigate effectively cases of trafficking. While no legal restrictions prevent the police from conducting covert operations or electronic surveillance, poor training, rudimentary equipment and procedural inertia prevent the techniques from being utilized.

-- G. As part of an anti-trafficking initiative begun in 1996, the Nepal Police have occasionally trained a limited number of personnel in the investigation of trafficking. However, most training programs of this type are developed and administered by NGOs. The GON supports programs to the best of its ability by providing facilities and making its personnel available to attend.

-- H. In October, 2000, Nepal's Home Ministry, the UN Development Fund for Women (UNIFEM) and NGOs hosted a regional workshop for senior police officers to enhance cross-border anti-trafficking collaboration. Several follow-up meetings involving Nepal and India have taken place. Meeting of the South Asia Professionals against Trafficking was held in March 2004 in India with support from USAID SARI/Q and UNIFEM.

-- I. Nepal and India, are currently discussing their bilateral extradition treaty, signed in 1955. The treaty is being updated to address transnational crimes more effectively. Nepali law does not prohibit the government from extraditing its own nationals, but the GON has not had occasion to do so in connection with trafficking.

-- J. Post has no evidence that, as a matter of policy, GON authorities facilitate, condone or are otherwise complicit in human trafficking. However, local anti-trafficking NGOs report that individual local officials and border police sometimes accept bribes in exchange for allowing the traffickers and their victims to cross Nepal's border with India. The Commission for the Investigation of the Abuse of Authority (CIAA) has the power to investigate incidences of corruption by public officials.

-- K. No GON officials have been prosecuted for involvement in trafficking or trafficking-related corruption.

-- L. Nepal ratified ILO Convention 29 on Forced Labor on January 3, 2002, and ratified ILO Convention 182 on September 13, 2001. Nepal has not yet ratified ILO Convention 105.

Nepal has not ratified the Sale of Children Protocol, which supplements the Rights of the Child Convention; or the Protocol to Suppress and Punish Trafficking in Persons, Especially Women and Children, which supplements the UN Convention Against Transnational Organized Crime.

15. (SBU) PROTECTION AND ASSISTANCE TO VICTIMS

-- A. Questions regarding residency status and relief from deportation do not appear to apply to Nepal, as Nepal is not a destination country for international trafficking in persons. For victims of internal trafficking, victim care facilities are limited, and are run primarily by NGOs.

-- B. The GON provides limited funding to local NGOs to provide assistance to victims of trafficking with rehabilitation, medical care and legal services. The GON does not fund foreign NGOs. Bilateral and multilateral donors, working with the GON through the MWCSW, do fund local and foreign NGOs to provide victim assistance.

-- C. There is no formal screening or referral process in place to transfer victims from GON custody into local care facilities. In practice, however, it is common for the police to refer victims to local NGOs that maintain rehabilitation centers. Legal advocacy groups typically provide assistance at minimal or no cost to the victim.

-- D. The government of Nepal does protect the rights of victims. Trafficking victims are not detained, jailed, or deported, nor are they, as trafficking victims, prosecuted for violations of other laws. While the GON does not actively encourage trafficking victims to file civil suits or seek legal action against traffickers, once the victim does file a civil suit or make a criminal complaint, the GON will prosecute the case at no cost to the victim. The Nepal Police have initiated a "Women's Cell," aimed at assisting victims of trafficking and domestic violence.

-- E. The Nepal Police do not have an intensive screening process, but intercepted and returned survivors are handed over to the care of NGOs, which in turn pursue legal and other procedures. In most cases, NGO-provided prosecutions have successfully resulted in maximum punishments for the traffickers. Success is less likely in cases argued by public attorneys. Threats by traffickers, lack of personal security, open court hearings, and non-cooperative communities often discourage the victims from pursuing legal recourse. There is no restitution program in place, although proposed legislation includes this provision.

-- F. There is no provision for the government to provide protection to victims or witnesses.

-- G. As part of the new foreign employment initiative announced in January 2003 (see Prevention, para D), the GON opened an Embassy in Kuala Lumpur and appointed labor attachés to Malaysia and UAE, both of which have large concentrations of Nepali workers. The government has also initiated a request for Saudi Arabia and Malaysia to open consular sections in Kathmandu. A welfare fund will be established to assist workers injured on overseas jobs. Government representatives at Consulates in India, the destination country for most of Nepal's trafficking victims, do not receive special training in protection. However, they assist with the repatriation of victims to Nepal if cases are brought to their attention.

In May 1999, the MWCSW opened the Women's Skill Development Center, a rehabilitation and skills training center for women returned from being trafficked and for women at risk of being trafficked. However, the center was closed in 2003 due to lack of resources. Most "safe houses" and rehabilitation centers are run by privately-funded NGOs.

-- H. The government does not provide assistance to its repatriated nationals who are victims of trafficking.

-- I. There are more than 40 national-level NGOs working on the issues of trafficking. With the GON's endorsement, many NGOs conduct public information and outreach campaigns in rural areas. They also provide prevention education, micro-finance, rehabilitation, advocacy and legal assistance. Two representative NGOs are members of the MWCSW's National Task Force, and the GON works closely with NGOs to provide services to victims and assist in the implementation of the National Plan of Action.

16. (U) OMB Reporting Requirements: One FS-03 officer spent 8 hours drafting and clearing this year's TIP report. One FS-01 officer spent one hour, one FS-02 officer spent 15

minutes, and DCM spent 30 minutes clearing the report. One FSN-11 USAID employee spent twelve hours researching information.